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November 1, 2021

VIA ECF

Honorable Edward S. Kiel, U.S.M.J.

United States District Court for the District of New Jersey

Martin Luther King Building & U.S. Courthouse

50 Walnut Street

Newark, NJ 07102

Re: Pearson Education, Inc. v. Chegg, Inc.
Civil Action No. 2:21-cv-16866-SDW-ESK

Dear Judge Kiel:

This firm, together with Oppenheim + Zembrak, LLP, represents Plaintiff Pearson Education, Inc. ("Pearson" or "Plaintiff"), in the above-captioned matter. In support of Plaintiff's *pro hac vice* application, enclosed please find the Certification of Karen A. Confoy, Esq., the declarations of Matthew J. Oppenheim, Esq., Scott A. Zembrak, Esq., and Nicholas C. Hailey, Esq., and a proposed form of Order. Defendant Chegg, Inc., through counsel, has consented to this application.

If the attached papers meet with Your Honor's approval, we respectfully request that you sign and enter the proposed consent order. Thank you for your consideration of this request.

Respectfully submitted,

s/ Karen A. Confoy

Karen A. Confoy

Enclosures

Cc: Counsel of Record (*via* ECF)